

1 THE HONORABLE JAMES L. ROBART  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 UNITED STATES OF AMERICA, )  
11 v. Plaintiff, ) Case No. 2:12-cv-01282-JLR  
12 CITY OF SEATTLE, )  
13 Defendant. ) **CITY OF SEATTLE'S MOTION FOR**  
14 ) **ONE-WEEK EXTENSION**  
15 )  
16 ) **NOTE ON MOTION CALENDAR:**  
17 ) **November 15, 2019**  
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The City of Seattle ("City") submits this filing to seek the Court's leave for a one-week extension of the November 29th filing deadline. In its August 15, 2019 Motion to Approve Accountability Methodology, the City proposed the November 29th date based on information provided by experts from 21st Century Policing ("21CP"). The City did not consider, at that time, that the 29th is a City of Seattle holiday, and that the 28th is the Thanksgiving holiday for both the Court and the City. Given the scheduling issues presented by the Thanksgiving holiday the City believes that the interest of justice will be served by extending the City's filing deadline for one week, until December 6, 2019.

After receiving the Court's October 15th Order, the City conferred with 21CP to determine how much of the proposed methodology could be completed by November 29. The City and 21CP

1 quickly began work on a more focused methodology that would focus the assessment on the four  
 2 accountability issues identified and exposed by the Court. The methodology that the City filed  
 3 with the Court on August 15 has two parts: an assessment of the City's present accountability  
 4 system and a survey of comparable jurisdictions. To adhere as closely as possible to the original  
 5 schedule, 21CP will conduct both parts, but with a tailored and more narrow focus. The assessment  
 6 will encompass the four issues that have been emphasized by the Court, the Executive, City  
 7 Council, the Monitor, CPC, OIG, and OPA: (1) the statute of limitations for imposing discipline; (2)  
 8 subpoena authority of civilian oversight agencies; (3) the standard of review and quantum of proof in  
 9 disciplinary appeals, and (4) features of grievance arbitration that affect public confidence, such as  
 10 degree of transparency and the selection process for arbitrators.

11 The United States Department of Justice (DOJ) and the Community Police Commission (CPC)  
 12 have advised that they do not object to a one-week extension provided that their response deadlines  
 13 are also extended by one week. Accordingly, the City respectfully moves for an order granting it a  
 14 one-week extension to file the accountability assessment and accompanying pleading responsive to  
 15 the Court's October 15th Order. The City also seeks a corresponding one-week extension for any  
 16 responsive pleadings by DOJ and CPC.

17 DATED this 6th day of November, 2019.

18 For the CITY OF SEATTLE

19 s/ Paul Olsen  
 20 PAUL OLSEN, WSBA #29873  
 Assistant City Attorney

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## **CERTIFICATE OF SERVICE**

I hereby certify that on November 6th, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DATED this 6th day of November, 2019, at Seattle, King County, Washington.

s/ Paul Olsen  
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